

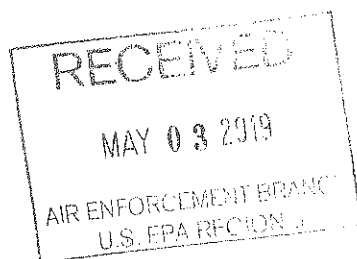


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April 29, 2019

**Sent by Certified Mail**

Director, Air and Radiation Division  
U.S. EPA Region V  
77 West Jackson Blvd.  
Chicago, IL 60604-3507



**Subject: BASF Corporation, Elyria, Ohio  
Facility ID 0247040195, Permit Number P0125035  
Annual Title V Compliance Certification Report**

Dear Sir / Madam:

BASF Corporation hereby submits the annual Title V compliance report for the period January 1, 2018 to December 31, 2018, as required by Part A.13.d of the site's Title V Permit.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

"Under its Title V permit BASF must report violations, which means determining whether indicated potential violations are actual violations. EPA's acceptance of BASF's proposed Environmental Management System (EMS) to resolve BASF's ongoing compliance issues through the Administrative Consent Order (ACO) in this matter requires this functionality. See ACO, paragraph 44. BASF has up to 12 months from the ACO's effective date to demonstrate compliance with the CAA and relevant permits. Ibid. Until BASF's EMS has this functionality, BASF should therefore continue to base its Title V reports on the observations and paper records required by the Title V permit. But in the interim, BASF should also

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include and appropriately label in its Title V reports potential deviations appearing in the Wonderware data."

Pursuant to EPA's instructions, we are basing our compliance certification on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

BASF had previously submitted to Region V information concerning *potential* deviations from the Wonderware data for January 1 through June 30, 2018 in connection with the consent agreement. However, Region V did not confirm that it would also seek potential deviation information going forward until the new system was in place until after the semi-annual Title V report for the second half of 2018 was due. As such, we are providing the potential deviations for July 1 – December 31, 2018 with the 2018 Title V annual compliance report.

Beginning with first quarter 2019, information on *potential* deviations will be included in the Title V reports.

Based on available information and belief formed after reasonable inquiry, the undersigned certifies that the statements and information in this report are true, accurate, and complete. Please contact Nancy Gallagher at (440) 329-2427 if you have any questions concerning this report submittal.

Sincerely yours,

A handwritten signature in blue ink that reads "Michele Barney".

Michele Barney  
Site Director, BASF Elyria

Enclosures

*Potential Deviations* for July 1, 2018 to December 1, 2018 reporting in accordance with the following instructions.

Please note that the Elyria site recently entered into a consent agreement with EPA Region V that requires it to convert its additional operations management software into a real-time environmental monitoring and recordkeeping system. As part of this transition, the site has begun to gather and review data that reflects certain Title V permit parameters, but because the transition is not yet complete, the site cannot yet determine whether any deviations recorded in this system reflect violations of permit terms or are attributable to some other cause. Until the new system is in place, EPA Region V advised us to submit this information as follows:

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Pursuant to EPA's instructions, we are basing our Title V reports on the paper records required by the Title V permit, but we are also including deviations reflected in the Wonderware data, labeled as "potential deviations."

Unit ID	Source	Air Pollution Control Device	Monitoring Requirements	Potential Deviations
P006	Copper Calciner 1 (E-10)	Main Draft Dust Collector	Pressure drop (0.1-5" WC)	4
P006	Copper Calciner 1 (E-10)	Packaging Dust Collector	Pressure drop (0.1-5" WC)	13
P009	Rotary Calciner #4 (E-13-1)	Calciner 4A Dust Collector	Baghouse Pressure drop (0.1-5"WC)	19
P009	Rotary Calciner #4 (E-13-1)	Calciner 4B Dust Collector	Baghouse Pressure drop (0.1-5"WC)	96
P010	Rotary Calciner #1 (E-14)	Dust Collector #1	Baghouse Pressure drop (0.1-5"WC)	2
P010	Rotary Calciner #1 (E-14)	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	38
P018	Wyssmont Drier (E-22)	Baghouse	Baghouse pressure drop (1-7"WC)	22
P026	Double Cone Blender B-1&2 (E-30)	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	3
P080	Rotary Calciner #5 (E-13)	Dust Collector 5A	Pressure drop (0.1-5"WC)	4
P080	Rotary Calciner #5 (E-13)	Dust Collector 5B	Pressure drop (0.1-5"WC)	3
P086	Gen Cat P&S Dryer #1	Dust Collector #1	Pressure drop (0.1-5"WC)	3
P092	Rotary Calciner #6	Dust Collector #6	Pressure drop (0.1-5"WC)	12
P092	Rotary Calciner #6	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	5
P095	Copper Calciner #2 (E-101)	Main Draft Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	15

P095	Copper Calciner #2 (E-101)	Feed Hopper Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	15
P095	Copper Calciner #2 (E-101)	Discharge Dust Collector	Baghouse Pressure Drop (0.1-6"WC)	18
P099	PK Blender #2 (E-103)	Bldg. 9 Dust Collector	Baghouse Pressure drop (0.1-5"WC)	1
P099	PK Blender #2 (E-103)	Bldg. 9 Scrubber	Pressure Drop (>2"WC) AND Water Flow (>2 gpm)	4
P102	Rotary Calciner #2	Dust Collector #2	Baghouse Pressure drop (0.1-5"WC)	15
P102	Rotary Calciner #2	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	3
P102	Rotary Calciner #2	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	19
P103	Rotary Calciner #3	Dust Collector #3	Baghouse Pressure drop (0.1-5"WC)	12
P103	Rotary Calciner #3	Dust Collector #8	Baghouse Pressure drop (0.1-5"WC)	2
P103	Rotary Calciner #3	F1-Scrubber	Demister DP (0.1-7") and Recirculation flow (>25 GPM)	21
P106	National Dryer	National Dust Collector	Baghouse Pressure drop (0.1-5"WC)	11
P121	P&S Dryer #2	Dust Collector #2	Baghouse pressure drop (0.1-5"WC)	27
P122	P&S Dryer #3	Dust Collector #3	Baghouse pressure drop (0.1-5"WC)	1
P130	#6 P&S Dryer	Sly Scrubber	Flow > 2 gpm AND Demister Pressure Drop (0.05-1"WC)	8
TriMer	Trimer Scrubber	TriMer 1st Stage Pressure Drop	Pressure Drop (0.05-3"WC)	58
TriMer	Trimer Scrubber	TriMer 2nd Stage Pressure Drop	Pressure Drop (0.2-5"WC)	4
TriMer	Trimer Scrubber	TriMer 3rd Stage Pressure Drop	Pressure Drop (0.2-6"WC)	10
TriMer	Trimer Scrubber	Trimer Stage #1 Recirculation Flow	Flow >50 gpm	5
TriMer	Trimer Scrubber	Trimer Stage #2 Recirculation Flow	Flow >50 gpm	3
TriMer	Trimer Scrubber	Trimer Stage #3 Recirculation Flow	Flow >50 gpm	5
TriMer	Trimer Scrubber	Trimer Stage #1 pH	pH >9	4
TriMer	Trimer Scrubber	Trimer Stage #2 pH	pH >9	2
TriMer	Trimer Scrubber	Trimer Stage #3 pH	pH >9	2

**TV Annual Compliance Certification 182088**

**BASF Corporation**

**0247040195**

**April 29, 2019**

**Ohio EPA, Division of Air Pollution Control**  
**Title V Annual Compliance Certification**

Apr 29 2019, 08:21:14

**Facility ID:** 0247040195  
**Facility Name** BASF Corporation

**Report ID** 182088  
**Report Type** TV Annual Compliance  
Certification

**Reporting Period** 2018

**Submitted:** No

**Report Status** Draft

**1. Identification of Intermittent Compliance (IC)**

Intermittent compliance may be identified through either the following table or by attaching the information below. When attaching a document in lieu of using the table below, the document must meet the required format and content requirements for annual certifications. You can download a 'Title V Compliance Certification' form that meets these requirements along with instructions and examples from the system's Reference Page. Except as indicated in this section, the Material Information Section below, or any attachments submitted in lieu of using this sections, submittal of this report shall indicate all emissions units subject to one or more applicable requirements operated in continuous compliance with all federally enforceable permit terms and conditions throughout the reporting period identified above.

IC ID	EU ID	Emission Limitation/Control Measure or Permit Term No.	Compliance Method	Excursions/Deviations (one of the following must be provided)	
				Report Date of Those Documented Within Excursion/Deviation Reports Submitted to DO/LAA	Explain the Date, Nature, Duration, and Probable Cause of the Excursion/Deviation, as well as any Corrective Action Taken
66602	P092	Condition C.9.b.1.g	Visual inspection	Oct 22, 2018	
66603	P121	Condition C.16.d.3.b	Title V reading sheets	Jul 26, 2018	
66601	P010	Condition C.3.b.1.d	Visual inspection	Apr 16, 2018	
66604	P122	Condition C.17.d.3.b	Title V reading sheets	Jul 26, 2018	

**2. Any Material Information Not Established Through the Applicable Permit Terms and Conditions That May Indicate Non-Compliance**

For each peice of material information, identify the emissions unit or briefly describe the requirement and then provide a description of the material information. For insignificant emissions units, include the permit number or SIP-based applicable requirement rule reference. If you are attaching a Title V Compliance Certification form that includes this information you do not need to duplicate it here.

### 3. Attachments

If you are attaching any previously submitted reports as part of this submittal, remember to also report the name and the date of the report.

Attachment ID	Attachment Type	Description	Public Document	Trade Seceret Document	Trade secret Justification	Event Date
No attachments found						

**TV Annual Compliance Certification 182088**  
**BASF Corporation**  
**0247040195**  
**April 29, 2019**

If I am claiming any information in this submission is a trade secret, I hereby swear or affirm that the trade secret request meets the requirements of Ohio Administrative Code 3745-49-03(B) and that the justification submitted with the trade secret request sets forth the basis for claiming that the information should be considered a trade secret as defined in Ohio Administrative Code 3745-49-02(T).

I, being the individual specified in OAC rule 3745-77-03(D), hereby affirm that the statements made in this Title V Compliance Certification, which I am submitting to Ohio EPA via the Ohio EPA's Air Services software on the date indicated in Air Services, are true, accurate and complete, based on information and belief formed after reasonable inquiry. In affirming the statements made in this compliance certification, I am not attesting that I have personally examined and am familiar with this facility's compliance with every permit term and condition covered by the certification period, I am only attesting that I have personally examined this Compliance Certification and am familiar with the information submitted herein as being true, accurate and complete based on information and belief formed after reasonable inquiry, as the Certification so states.

Signee Name (please print):

Michele Barney

Title:

Site Director

Signee Signature:

Michele Barney

Date:

4-29-19

Note: If confidential or trade secret information is included in this submission, a copy of this Title V Compliance Certification must be submitted (i.e., post marked) to the

Administrator of the United States Environmental Protection Agency  
c/o Director, Air and Radiation Division,  
U.S. EPA Region 5,  
77 W. Jackson Blvd., AE-17J,  
Chicago, Illinois 60604.

If no confidential or trade secret information is included in this submission, electronic submission via Air Services meets the federal submission requirement to U.S. EPA pursuant to agreement between Ohio EPA and U.S. EPA, Region V.  
It is recommended that any compliance certification mailed to U.S. EPA Region V be sent by certified mail.